IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE PEDRO MANUEL MONTANEZ RIVERA CARMEN DELIA BORGES RODRIGUEZ DEBTORS	CASE NO 13-07032/MCF CHAPTER 13

NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN AND CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

NOW COME, PEDRO MANUEL MONTANEZ RIVERA and CARMEN DELIA BORGES RODRIGUEZ, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray:

1. Debtors are hereby submitting a proposed amended Plan, dated November 13, 2013, herewith and attached to this motion.

2. This proposed amended Plan is filed to cure the objection raised by the Trustee in his unfavorable report on confirmation, docket no. 15, dated November 6, 2013.

WHEREFORE debtors respectfully request the confirmation of the requested amended Plan, dated November 13, 2013.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtors in the above captioned case, and to all creditors and parties in interest in the present case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 13th day of November, 2013.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
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United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 3:13-bk-7032

MONTANEZ RIVERA, PEDRO MANUEL & BORGES RODRIGUEZ, CARMEN DELIA
Debtor(s)

Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: ______
☐ PRE ☐ POST-CONFIRMATION

☑ AMENDED PLAN DATED: 11/13/2013
Filed by: ☑ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ 150.00	x 41	= $	6,150.00
$ 300.00	x 19	= $	5,700.00
$	x	= $	
$	x	= $	
$	x	= $	

TOTAL: $ 11,850.00

Additional Payments:
$ ______ to be paid as a LUMP SUM within ______ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above:
$ ______ x ______ = $ ______

PROPOSED BASE: $ 11,850.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: $ 2,762.00

Signed: */s/ PEDRO MANUEL MONTANEZ RIVERA*
Debtor

/s/ CARMEN DELIA BORGES RODRIGUE
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR ____ $ ______
B. SECURED CLAIMS:
☐ Debtor represents no secured claims.
☑ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☑ Trustee pays secured ARREARS:

Cr. BANCO POPULAR D	Cr. DORAL FINANCIAL	Cr. See Attached
# 71010019245169	# Claim 8-1	#
$ 266.85	$ 508.25	$

2. ☑ Trustee pays IN FULL Secured Claims:

Cr. HOUSING ADMINIST	Cr.	Cr.
# 47E22	#	#
$ 160.00	$	$

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr.	Cr.	Cr.
#	#	#
$	$	$

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☑ Debtor otherwise maintains regular payments directly to:
BANCO POPULAR D DORAL FINANCIAL See Attached

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)
D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.
1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ______
☐ Paid 100% / ☐ Other: ______

Cr.	Cr.	Cr.
#	#	#
$	$	$

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: *(Executory contracts; payment of interest to unsecureds, etc.)*
Priority: $984.00
Late filed claims filed by creditors will receive no distribution.
"Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.
Debtor reserves the right to object claims after plan confirmation.
* "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."

Attorney for Debtor R. Figueroa Carrasquillo Law Office Phone: (787) 744-7699

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IN RE MONTANEZ RIVERA, PEDRO MANUEL & BORGES RODRIGUEZ, CARMEN DEl Case No. 3:13-bk-7032
Debtor(s)

CHAPTER 13 PAYMENT PLAN

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	Cr	#	$
Trustee pays secured ARREARS:	FIRST BANK	Claim 6-2	493.50
	TOYOTA MOTOR CRI	70404061413220001	337.00
Debtor Otherwise maintains regular payments directly to:	FIRST BANK		
	TOYOTA MOTOR CRI		

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DPTO DE TRANSPORTACION Y OBRAS PUBLICAS
PO BOX 41269
SAN JUAN, PR 00940-1269

FIA CSNA
PO BOX 982235
EL PASO, TX 79998

FIRST BANK
PO BOX 19327
SAN JUAN, PR 00910-1427

HOUSING ADMINISTRATION SERVICES INC
PO BOX 1043
SABANA SECA, PR 00952-1043

JC PENNEY
PO BOX 364788
SAN JUAN, PR 00936-4788

PENTAGON FEDERAL CR UN
PO BOX 1432
ALEXANDRIA, VA 22313

PR TELEPHONE COMPANY
PO BOX 71401
SAN JUAN, PR 00936-8501

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

SAMS
PO BOX 965004
ORLANDO, FL 32896-5004

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PO BOX 2730
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